

United States Courts  
Southern District of Texas  
FILED

DEC 21 2021

Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

Vs.

Gholamreza Hosseinpour

## CRIMINAL COMPLAINT

Case Number: C-21-1536M

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about December 19, 2021 in Brooks County, in the Southern District of Texas, defendant, Gholamreza Hosseinpour

did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law

in violation of Title 8 United States Code, Section(s) 1324.  
I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:  
OFFICIAL TITLE

See Attached Affidavit of U.S. Border Patrol Agent John Vanderveen

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on the:

John Vanderveen  
Signature of Complainant

John Vanderveen  
Printed Name of Complainant

December 21, 2021

Date

at

Corpus Christi, Texas

City and State

Jason B. Libby U.S. Magistrate Judge

Name and Title of Judicial Officer

Jason B. Libby  
Signature of Judicial Officer

## **AFFIDAVIT**

The information contained in this report/affidavit is based upon my personal participation in the investigation, which included, but is not limited to information relayed to me by other agents and officers participating in the investigation.

### **FACTS/DETAILS:**

On December 19, 2021, at approximately 8:30 p.m., a gray 2018 Honda CRV containing three visible occupants entered the primary inspection area of the United States Border Patrol checkpoint near Falfurrias, Texas for an immigration inspection. After greeting the individuals, the Border Patrol Agent working primary inspection began their immigration inspection. The agent asked the driver, later identified as Gholamreza Hosseinpour, if all occupants were related. The driver answered, "Yes, all family." The agent noticed the front seat passenger, later identified as Parisa Behdarvand Parviz, and rear seat passenger, Pezhaman Moosavi Ali, were staring straight forward and avoiding eye contact. The agent's experience had taught him this was a tactic commonly used by illegal aliens to avoid questioning by immigration officials. At this time, the agent asked Ali if he had any form of identification. Ali ignored the question and kept looking straight forward. Hosseinpour attempted to interject by stating "Yes, we all have identification." The agent informed Hosseinpour he wanted to question everyone individually. The agent next asked Parviz to produce identification and she ignored his question. At this time, the agent instructed Hosseinpour to drive to secondary immigration inspection.

Once in secondary inspection, it became apparent that neither of the passengers spoke the English or Spanish language. Agents used facial recognition technology and a brief interview with Hosseinpour to determine that both Ali and Parviz were citizens of Iran illegally present in the United States. At this time, Hosseinpour was placed under arrest for smuggling illegal aliens and Ali and Parviz were arrested for being illegally present in the United States.

Hosseinpour was advised of his Miranda Rights in the English Language. Ali and Parviz were advised of their rights using translation services in the Persian language. Ali invoked his right to not make a statement without the presence of an attorney.

### **PRINCIPAL STATEMENT (Gholeamreza Hosseinpour):**

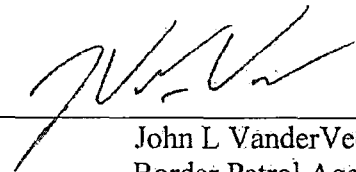
Hosseinpour stated he is the great uncle of Ali and Ali's father had contacted him to let him know Ali was in McAllen, Texas and needed to get a ride to Virginia. Hosseinpour stated Ali's father also told him Moosavi made arrangements with a criminal organization to be smuggled out of Iran into South America and eventually into the United States. He stated Ali paid \$25,000.00 for these arrangements. Hosseinpour said he told Ali's father it would be best for them to turn themselves into police or immigration authorities as it would be difficult for them to live illegally in the United States. However, on the date of his arrest, Hosseinpour flew from Virginia to San Antonio, Texas, rented a car, and drove to McAllen where he picked up both Ali and Parviz. After picking them up, he started to drive north to San Antonio, Texas. Hosseinpour was unaware of the Border Patrol checkpoint. He stated it was his intention to eventually turn Ali and Parviz over to immigration authorities.

**MAT-WIT STATEMENT (Parisa Behdarvand Parviz):**

Parviz stated she left her home in Iran and traveled to Turkey and then on to Venezuela. From Venezuela, she made her way to the United States by crossing the international boundary with Mexico illegally on a boat two days prior to her encounter with Border Patrol. She stated she looked for a police station, but unable to find one, she stayed in a motel for a night. Parviz was then picked up by a family friend of her husband, Ali, to be transported to Virginia. The family friend was later identified as Gholamreza Hosseinpour. She states Hosseinpour did not have knowledge of her illegal presence in the United States, and she did not pay him money to drive her to Virginia. Parviz stated the other illegal alien she was encountered with, Pezhaman Moosavi Ali, is her husband.

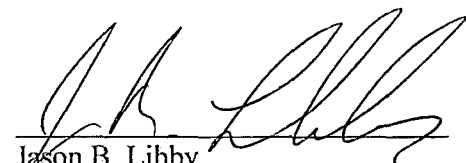
**DISPOSITION:**

The facts of this case were presented to the Assistant United States Attorney Office who accepted Gholamreza Hosseinpour for prosecution of 8 USC 1324, Alien Smuggling. Parisa Behdarvand Parviz and Pezhaman Mossavi Ali will be held as material witness.



John L VanderVeen  
Border Patrol Agent

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on this day December 21, 2021.



Jason B. Libby  
United States Magistrate Judge